

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

DAVID MOORE  
a/k/a "King David"  
a/k/a "KD,"

Case No. 13-919M(NJ)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see dates below in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:

## Code Section

## Offense Description

Count 1: 18 U.S.C. § 1589, 1591,  
and 1594Conspiracy to Engage in Sex Trafficking and Forced Labor of a Juvenile  
(On or about 02/2008, and continuing through on or about 12/2009)Count 2: 18 U.S.C. §§ 2, 1591(a)  
(1), 1591(b)(2), and 1594(a)Engaging in Sex Trafficking of a Minor by Force, Fraud, or Coercion  
(On or about 02/2008, and continuing through on or about 12/2009)Count 3: 18 U.S.C. §§ 373 and  
1591Solicitation to Commit a Crime of Violence  
(On or about 07/2011)

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

TRAVIS HOMER

Printed name and title

Sworn to before me and signed in my presence.

Date: 11.6.13City and state: Milwaukee, Wisconsin

Judge's signature

NANCY JOSEPH

Printed name and title

I, Travis Homer, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed by the FBI since March, 2008. Prior to being employed by the FBI, I was a police officer in the State of Utah, City of Layton, for about 8 years. I am currently assigned to the FBI Milwaukee Division's Human Trafficking Task Force, which investigates the illegal trafficking of persons, both domestic and foreign, for the purposes of labor and commercial sex acts. I gained experience in the conduct of such investigations through formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies, as well from the investigations themselves.

2. The facts in this affidavit come from my personal observations, my training and experience and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is intended to show merely that there is sufficient probable cause for the arrest warrant of David Moore for Title 18, U.S.C. §1589, entitled "Forced labor," Title 18, U.S.C. §1591, entitled "Sex Trafficking of children or by force, fraud or coercion," 18 U.S.C. § 1594 (conspiracy), entitled, "General provisions, and Title 18, USC §373 entitled "Solicitation to Commit a Crime of Violence" and does not set forth all my knowledge of this matter.

4. Your affiant has been investigating the human trafficking activities of David Moore. As part of this investigation, your affiant reviewed the statements of JV-1. According to JV-1, in Summer 2007 when JV-1 was about 15 years old she met David Moore's son, NM, and entered into what she thought was a romantic relationship.

5. According to JV-1, NM shortly thereafter introduced her to his father, David Moore. NM told JV-1 that David Moore was a pimp and had several girls working for him. NM told JV-1 that he could get her nice clothes and a nice car. At some point during the summer of 2009, when JV-1 was still a juvenile, NM and JV-1 resided with David Moore. David Moore agreed to let them live with him as long as JV-1 made money either by dancing at strip clubs or by engaging in commercial sex acts.

6. According to JV-1, she needed an identification document to work at the strip clubs as she was underage. David Moore provided JV-1 with a false identification card, which was obtained from another pimp, who lived in the area of Green Bay Avenue and Capitol Drive in Milwaukee, Wisconsin. The identification was from another state, displayed a fake name and falsely stated that JV-1 was over 21 years old. According to JV-1, JV-1 was 16 years old at the time.

7. According to JV-1, from February 2008 through December 2009, when she and NM needed a place to stay, David Moore, who stayed in different hotels, would occasionally let JV-1 and NM stay with him. During that time both NM and David Moore expected JV-1 to engage in commercial sex acts and to dance as a stripper. JV-1 gave the money she earned to NM and she knew that David Moore would take a percentage of the money. In addition, David Moore paid for JV-1's clothing, which was needed for stripping and paid for her to get her nails done.

8. JV-1 stated that during the above period NM would often beat her and choke her and control where she went. In addition, JV-1 stated that she has seen David Moore get angry both verbally and physically. JV-1 also told law enforcement that she saw David Moore get verbally and physically violent against those who worked for him if he wanted to make them comply with his orders.

9. Your affiant knows that pimps will routinely beat and abuse those whom they prostitute and will do so in the presence of others who work for him so as to establish a climate of fear and control and to make them follow his directions without questioning him.

10. JV-1 stated that during the above period David Moore took her to the Airport Lounge located at 5881 S. Howell Avenue, Milwaukee, Wisconsin and David Moore talked to the manager. David Moore told her what to do and how to dance. David Moore's other girls also told JV-1 what to do and what to say in order to obtain prostitution "dates" while in the club. JV-1 was encouraged by David Moore to get telephone numbers from customers. At that time, whatever money JV-1 made she gave to NM, who then gave a percentage to David Moore. David Moore also took JV-1 to Solid Gold, located at 813 S. 1<sup>st</sup> Street, Milwaukee, Wisconsin. The first two nights she worked there, David Moore was in the club but acted as if he did not know JV-1.

11. Your Affiant knows it is a common practice for pimps to conceal their relationship with those they prostitute because they know potential customers are reluctant to pay for commercial sex acts with individuals who have a pimp.

12. When JV-1 did not obtain a prostitution date, David Moore later instructed her on who were the potential customers. After the first two nights of working at Solid Gold JV-1 was to make at least \$250 dollars and if the minimum amount was not earned, NM beat JV-1. In addition, JV-1 was told to charge a certain amount of money for a one-girl date and twice the amount for a two-girl date. Since David Moore provided the second girl for the two girl date, David Moore got 50 percent of the earnings and NM got the other half.

13. David Moore trained NM how to be a pimp in the presence of JV-1. Shortly after working at Solid Gold, JV-1 was arrested with a fake Florida identification card. JV-1 stated David Moore knew the manager at the club On the Border, located at 10741 S. 27<sup>th</sup> Street, Franklin, Wisconsin. David Moore arranged with the manager to have JV-1 audition. JV-1 had obtained another fake identification in the name of Lakesha Last Name Unknown. JV-1 was kicked out of the club after approximately one week after management determined the identification JV-1 used was fake and that she was underage.

14. After being kicked out of On the Border, David Moore took JV-1 to various Milwaukee taverns frequented by white male customers. JV-1 went into the taverns looking for white males who were generous enough to buy her drinks. JV-1 was taught this tactic by NM and David Moore. JV-1 was expected to find three dates a night at the bars. She did not get days off and if she was on her menstrual cycle NM told her "your mouth ain't bleeding." As time progressed, JV-1's quota moved up to \$450 per day, set by NM and David Moore. JV-1 was expected to give NM at least \$150 a day or be beaten, and she also was expected to give money to David Moore.

15. As part of this investigation, law enforcement recovered a letter authored by David Moore, dated July 19, 2011 in NM's possession. Your affiant as part of this investigation learned that David Moore was serving a state prison sentence during July 19, 2011. The letter was addressed to NM and told NM to monitor David Moore's prostitution business while he was in custody. The letter solicited NM to call several individuals who David Moore had prostituted in the past and directed NM to make sure they continued to work for David Moore. In the letter David Moore directed NM to "be my eyes and ears." For example, in the letter David Moore wrote:

*"Damn man, we got so much to do, and so much to talk about and discuss.. and you can get alot done through me "and" Vice Verca! Cause for right now, some things I just ain't gonna get done without you. And honestly, I really want you to get where you can collect money from certain hoes for me, and just keep it for me and make sure I get what I need in here. . Cause only a fool will trust his hoe!!"*

Attached to this affidavit is a copy of the letter and is incorporated herein.



Tues  
July 19<sup>th</sup>  
2:45  
12:45 Noon

Hey Nijer, Whats' up Man, u alright??  
and did u get my 1<sup>st</sup> letter last Month? Cause I  
haven't heard Nothing from u, so I'm Wondering if  
u ever got the letter. I've also been Calling yo -  
cell-phone too; and I see u have yet to put that  
lil-Money on there. So I'm Wondering Whats' going  
on and Whats' happening with u. Now I of

all people "Know" how that lifestyle is and how  
it can be and how it can "at times" take you  
from everything else. However, we can make  
time for what we want to make time for. Wj.

With that said, I need you to "make time" to  
call that 1800-Number, set your lil-account up and  
put that lil-Money on your Phone Nijer, OK.

Cause so far you've "missed" one trip to South  
Dakota or Dakota.. and before she went I asked  
her goofy-ass twice have u called and she said  
No. And that throwed me off again cause I was  
under the impression from u that u were trying  
to take up-people up there. Plus I wanted u  
to go and be my eyes & ears for me; u feel me?

Now there is a block on Texas' phone Man, and  
the last time I spoke to her ass was on Sunday-  
night; and she said she was on the highway on  
her way back to Micho. But I ain't heard shit  
from her since. So find out whats' going on with

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that for me. And tell her I said put some money on that phone "Now," cause these Parole people Need a Number for me "for the bracket". And I also am Wondering if something Went Wrong on her way home because she was suppose to get up early - Monday Morning - Yesterday" and do that so I could get the house Number from her for these parole people.. Ask her what the fuck happen?

Oh yea Man, there is a bitch that be with Tessa Name Ferra.. Now Ferra is a hoe, and also a theft loving ass Bitch.. She likes to steal; and Not only from just tricks, but other hoes and even her friends at times too. She has even got Tessa's goofy ass a few times.. She got her ass Kick for it but "even so" she did it. Anyways; We need to get around Tessa and get that Bitch!

She is a Very Nice looking Thick Bitch too. She lives and fucks with this older nigger My age or a bit older.. She cares for him I guess in her own way. But she cheats on him, and "alot" of the times goes - and does what she wants ~~along~~ he aint ~~around~~.. He tries to P, and gets some money from some hoes sometimes", but he is Not a real pimp - and he D+T at some bar.

You Need to start Coming around, get up under Tessa, and Knock That Bitch Nigga For real!!



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Now Tessa has been friends with the hoe for a while; they have fucked each other before, and maybe still is.. But she ain't paying me or Tessa, and she is getting free rides in and out of town from Tessa, and I'd guess giving the money to her older boy friend & pimp boy friend - D.I. dude

Now listen Man, u can't just call Tessa up and be like where the Faira Bitch at, put on the phone. Cause I believe Tessa got a serious crush on the bitch, and will peep that, and hide that bitch from u and keep the bitch away from u!! Befriend Tessa, and get the hoe that way. And the EBoney Bitch, and the "Carmen" Bitch, and the Missy Bitch! She got ALOT of free ass willy nilly real-hoes around her every day, it Night.. And u can get em one by one if you just befriend Tessa!! Come over to the house and kick it with her and drink & smoke, and behave as if u are around to check on her well being while I am locked-down.. Then after a couple weeks you'll see for yourself and know which hoe u want that she constantly has around against my wish.. and I say that Naje cause ain't no bitch suppose to constantly be around ya bitch "that's not paying you, period." She knows that shit like u & I do!! But I'm in here, so when the cat is away the mice will play: as they say Naje.. But if u don't get none of the hoes that be around Tessa →

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believe me, some nigga will... I'd rather it be you!!

And I really wish you'd gone and put that lil' ass money on yo' phone so WE can talk!! Cause we really can't get to much of Shit done like this. And u don't seem to want to write either...

Oh, and before I forget "don't ever-ever let yo' bitch" that's bringing in the most money stay working at any one place for a long time! A long time being over 3 ~~more~~ Months in a Row!! bounce her around and it will keep other ho's that work wit her out yo' business, and Niggas; and the People who Run down the place. And it will keep

her fresh and off balanced. Trust ME, once other ho's at work get in yo' business, she is almost gone!! She gone start listening to their bullshit on why she shouldn't be with u, and y she is crazy for fuckin' with you & giving you her money.. and u gonna find yo self arguing with more & more and also putting yo hands on her more & more until everything falls apart!! And happen with me & Iceass at silks. She was there to many months in a row ~~Taaa~~ Long!! Same thing that happen to P. Slim and Asia at Silks, there ~~Taaa~~ Long and she end up leaving him for the old ass White D.V. Trust ME NA'VEE, a traveling hoe, is a hard working hoe = s a happy hoe.

Iceass

1800-944-6591  
Phone #  
so I  
can call  
you

Yo Lil' sis  
#



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A = Working hoe = a happy hoe, and happy hoe = a happy Pimp.. So You Need to have her on some traveling shit Naj as well as "yourself".

Traveling is how I met Phillin, Tyrod, Min Cachers, and a bunch of other heavy hitters!!

Local hoers only do local shit, go Nation wide if u want to catch Big.. Getting a bitch from somewhere else and putting her in the Border and Silks is a "good idea." Cause that way she knows Nobody but u, so there is less room for her to run-off and Play games.. But

you must travel; cause it allows u to catch other niggas hoe out of Pocket, and off-gard.. and When hoers is out of town they be more likely to fuck wit u, pay u and do more out of pocket shit than if they was in Miter at a home Club. And Keep yo niggas away from your hoers and Pimp B Hoe Business!! The shit don't Mix, and also drug-dealing and Pimping don't Mix!!! Remember bonding <sup>21</sup> with the hoe that's paying you the most Money is always more important than who u like the most, or who fucks u best, or who you've known longer..

Bond More with who the fuck is Feeding u and Keeping off the bus & walking!! It does get frustrating looking at & Fucking the same ole bitch.

Remember,  
desire creates  
talent!

But always  
take having  
bitch as a good  
opportunity  
to bond.

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every day." But that is when u get the molding & deep-bonding done 1 on 1 Najee. So enjoy yourself when it's only 1 hoe too. But Never Ever have 1 hoe to long "because she will start to see you as her "boyfriend" and Not her Pimp!! and also, 1 hoe is a number to close to No-hoe; feel me?

And before I move on, I stress and begg u to go find you a White Girl Najee = Trust me, you'll see more Money than you ever thought possible!!

Now I have got a chance to speak to My sis Lynn and she said that ll was gonna put some money on your phone for us to be able to talk & put things in order.

I truly wish ll would hurry-up so u ~~can~~ can get some of that Money in South Dakota, and some of the bitches that are around Tessa's ass Najee For Real!!

Damn Man, we got so much to do, and so much to talk about and discuss. And you can get alot done through me "and" Vice versa!

Cause for right Now, some things I just aint gonna get done without you. And honestly, I really want you to get where you can collect Money from certain hoers for me, and just keep it for me and make sure I get what I need in here. Cause only a Good Will trust his hoe!! I love you, and I'm really aching to hear from you and have u bully back in my life. Love to Pats.

Say Man, I'm  
gonna try to  
call ya phone  
Thursday,  
Please have  
some Money  
on there.  
A Van  
got some off  
you?



A day Mam, I know u stay high as a  
Eagles dick. So u May want to read this  
twice. Also amon Let me know if you got  
my last letter. And Put that lil-Money on  
you dang Phone Man! Love You Najeer!!

This whole  
Family Can be fixed by  
Just me & you Najeer (I know I?)